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May 30, 2019

*Via electronic submittal*

National Freedom of Information Officer  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW (2822T)  
Washington, DC 20460

Re: Freedom of Information Act Request

Dear Sir or Madam:

This is a request under the Freedom of Information Act, 5 U.S.C. § 552, as amended.

I hereby request that a copy of the following be provided to me:

1. All documents (including, but not limited to: memoranda; correspondence; email communications; phone conversation notes or logs; teleconference or meeting notes or logs; and calendar invitations) between or among employees, representatives, contractors, grantees, executives or political leaders of EPA Headquarters and employees, representatives, contractors, grantees or political leaders of the State of North Carolina (including, but not limited to, the North Carolina Department of Environmental Quality (and any and all predecessor agencies thereto), the North Carolina Department of Justice (including, but not limited to the Attorney General's office, and the Environmental Division), the North Carolina Environmental Management Commission, or any combination thereof) from January 1, 2013 through the present, referencing, evidencing or otherwise relating to the follow subjects:
  - a. The facility located at 850 Warren Wilson College Road, Swannanoa, NC that is assigned EPA ID No. NCD070619663 (sometimes referred to as "Asheville Dyeing & Finishing," "Old Asheville Dye and Finishing Location," "Winston Mills Inc. Asheville Dyeing & Finishing," and "Anvil Knitwear, Inc.");
  - b. WASCO LLC (or just WASCO);
  - c. the contested case named *WASCO LLC v. N.C. Dept. of Environment and Natural Resources* (13 EHR 18253; 15-CVS-1438, COA 16-414, 164P17);

ADMIN 35333781v1

- d. the case named *State of North Carolina v. WASCO LLC* (18-CVS-1731, COA 19-355);
  - e. the definition of “operator” under (i) the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.*, (“RCRA”), (ii) the portions of the North Carolina Solid Waste Management Act that comprise or govern the State’s hazardous waste management program, (“State Act”), (iii) any rules, regulations or policies promulgated under RCRA or the State Act, and/or (iv) any combination thereof.
2. All documents (including, but not limited to: memoranda; correspondence; email communications; phone conversation notes or logs; teleconference or meeting notes or logs; and calendar invitations) between or among employees, representatives, contractors, grantees, executives or political leaders of EPA Headquarters and employees, representatives, contractors, grantees or political leaders of EPA Region 4 from January 1, 2013 through the present, referencing, evidencing or otherwise relating to the subjects set forth in Paragraphs 1.a. through 1.e, above.

I am willing to pay fees for this request up to a maximum of \$100. If you estimate that the fees will exceed this limit, please inform me first.

I can be reached during regular business hours via the email or telephone numbers listed above.

Thank you for your prompt consideration and handling of this request.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'Bernadette M. Rappold', with a stylized flourish at the end.

Bernadette M. Rappold  
Shareholder